



**Service of Process  
Transmittal**

11/16/2021

CT Log Number 540590319

**TO:** Debra Roberts, Executive Assistant  
Tractor Supply Company  
5401 Virginia Way  
Brentwood, TN 37027-7536

**RE: Process Served in Louisiana**

**FOR:** TRACTOR SUPPLY COMPANY (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: CHRIS MARCEAUX // To: TRACTOR SUPPLY COMPANY

**DOCUMENT(S) SERVED:** --

**COURT/AGENCY:** None Specified  
Case # 202110800

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Baton Rouge, LA

**DATE AND HOUR OF SERVICE:** By Process Server on 11/16/2021 at 08:50

**JURISDICTION SERVED :** Louisiana

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT will retain the current log  
Image SOP  
Email Notification, Debra Roberts deroberts@tractorsupply.com  
Email Notification, Noni Ellison nellison@tractorsupply.com  
Email Notification, Stephanie Gaines sgaines@tractorsupply.com  
Email Notification, Matt Holden mholden@tractorsupply.com

**REGISTERED AGENT ADDRESS:** C T Corporation System  
3867 Plaza Tower Dr.  
Baton Rouge, LA 70816  
866-665-5799  
SouthTeam2@woltersklower.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

**CITATION  
ACADIA PARISH, LOUISIANA  
15th JUDICIAL DISTRICT COURT**

**SERVICE  
COPY**

**CHRIS MARCEAUX  
VERSUS 202110800 L  
TRACTOR SUPPLY CO ET AL**

**To: Tractor Supply Company, through its agent for service of process, its  
registered agent for service of process, CT Corporation System, 3867 Plaza Tower  
Drive, Baton Rouge LA 70816**

**Attached to this citation is a certified copy of the petition. The petition tells you  
what you are being sued for.**

**You must EITHER do what the petition asks OR, within (15) days after you have  
received this document, you must file an answer or other legal pleadings in the office of the  
Clerk of Court at the Courthouse, Court Circle, Crowley, Louisiana.**

**If you do not do what the petition asks, or if you do not file an answer of legal  
pleadings within fifteen (15) days, a judgment may be entered against you without further  
notice.**

**This citation was issued by the Clerk of Court for Acadia Parish, on November 8, 2021**

**ROBERT T. BAROUSSE, CLERK OF COURT**

*Michelle Sauer*

BY: \_\_\_\_\_  
Deputy Clerk of Court  
Acadia Parish

**ATTORNEY:  
WILL MONTZ  
1901 KALISTE SALOOM RD  
LAFAYETTE, LA 70508  
337-261-2617**

**Attached are the following documents: Petition for Damages and request for notice of trial,  
hearings and orders**

\_\_\_\_\_**INTERROGATORIES**\_\_\_\_\_**REQUEST FOR PRODUCTION OF DOCUMENTS**\_\_\_\_\_**OTHER**

**EFFECTIVE IMMEDIATELY: NO CELL PHONES OR RECORDING DEVICES ALLOWED IN THE  
COURTHOUSE.**

**SHERIFF'S RETURN**

**Received the within notice and copies of the same, on the \_\_\_\_\_ day of \_\_\_\_\_  
and on the \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_, served a copy of the within notice on:**

          **(personal service)**          

          **(domiciliary service)**          

**the parties herein named by handing same to them in person.**

**Returned and filed: \_\_\_\_\_**

\_\_\_\_\_  
**Deputy Sheriff**

\_\_\_\_\_  
**Deputy Clerk**

**ADDITIONAL INFORMATION**

**THESE DOCUMENTS MEAN YOU HAVE BEEN SUED. LEGAL ASSISTANCE IS ADVISABLE AND YOU SHOULD  
CONTACT A LAWYER IMMEDIATELY. JUDGES AND COURT PERSONNEL ARE NOT PERMITTED TO GIVE LEGAL  
ADVICE.**

15TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ACADIA  
NO. 20210800 DIVISION "L"

CHRIS MARCEAUX

VERSUS

TRACTOR SUPPLY COMPANY and ABC INSURANCE COMPANY

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**PETITION FOR DAMAGES**

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NOW INTO COURT, through undersigned counsel, come plaintiff, CHRIS MARCEAUX, a person of the full age of majority, and current resident and domiciliary of Acadia Parish, Louisiana, who respectfully represent the following:

1.

Made defendants herein are:

- a. TRACTOR SUPPLY COMPANY ("Tractor Supply"), a Delaware company, which may be served through its registered agent for service of process, CT Corporation System, 3867 Plaza Tower Drive, Baton Rouge, Louisiana 70816; and
- b. ABC INSURANCE COMPANY ("ABC INSURANCE, as the unknown insurer of Tractor Supply Company.

2.

Defendants, TRACTOR SUPPLY and ABC INSURANCE are liable unto plaintiff *in solido* for the full sum of the amount of damages reasonable in the premises to be proven at the trial on the merits, plus interest from the date of judicial demand until paid, and for all costs of these proceedings and for all general and equitable relief that plaintiff are entitled to for the following to-wit:

3.

At all times pertinent herein, Tractor Supply #1425 and its premises at 204 Odd Fellows Road, Crowley, Louisiana 70526 was owned by and/or was under the care, custody and control of defendant, TRACTOR SUPPLY.

4.

On or about November 1, 2020, plaintiff, CHRIS MARCEAUX, was a patron in Tractor Supply #1425 at 204 Odd Fellows Road, Crowley, Louisiana 70526 (hereinafter "CROWLEY TRACTOR SUPPLY), in Acadia Parish, State of Louisiana.

5.

On November 1, 2020, plaintiff, CHRIS MARCEAUX, was in the outside area of the CROWLEY TRACTOR SUPPLY, when he tripped over the forks of a forklift that was holding a boat above the ground, which caused CHRIS MARCEAUX to suddenly and violently tripped and fell and impacted the ground. At all times pertinent herein, there were no cautions or warning signs around the boat and/or forklift.

6.

The acts and omissions of the employees of defendant, TRACTOR SUPPLY, caused plaintiff to forcefully impact the ground, which resulted in plaintiff sustaining severe personal injuries for which he had to seek medical treatment.

7.

At all times pertinent herein, CHRIS MARCEAUX was free from fault in causing said accident; further, the said accident was solely and proximately caused by the negligence of defendant, TRACTOR SUPPLY, and/or its employees for whom it is responsible, whose acts or omissions of negligence, include the following:

- a. Failure to warn the public of the danger in that area;
- b. Failure to maintain the premises a safe and orderly condition;
- c. Failure to restrict the public and patron from a knowingly dangerous condition;
- d. Failure to inspect the premises and/or remove impairments of travel from the area;
- e. Creating a dangerous and hazardous condition on its premises;
- f. Failure to see what should have been seen or do what should have been done;
- g. Failure to act as a reasonably prudent administrator or take the action of a reasonably prudent person;
- h. Failure to develop, implement and/or follow proper guidelines, policies, regulations or procedures for maintaining the area in safe and unimpeded condition; and
- i. Any other acts of negligence which may be revealed through discovery, added as a negligence allegation in a supplemental and amending petition for damages and/or proven at the trial of this case.

8.

As a result of the incident on November 1, 2020 sued on herein, plaintiff, CHRIS MARCEAUX, suffered personal injuries and damages including:

- a. Injuries to the neck;
- b. Injuries to the back;
- c. Injuries to his arms, leg(s) and extremities; and
- d. Sprained and strained muscles, tendons, and ligaments of the body.

9.

Accordingly, plaintiff, CHRIS MARCEAUX, itemizes recoverable damages as follows:

- a. Physical pain and suffering past, present and future;
- b. Mental pain, anguish and distress past, present and future;
- c. Loss of enjoyment of life past, present and future;
- d. Medical expenses past, present and future.

**WHEREFORE**, plaintiff prays that defendants be duly served with a copy of the Petition for Damages, and after all legal delays and due proceedings had, there be judgment in favor of plaintiff, CHRIS MARCEAUX, and against defendants, TRACTOR SUPPLY COMPANY and ABC INSURANCE COMPANY, jointly, severally, and *in solido*, for compensatory damages and special damages in an amount that will adequately satisfy the demands of justice, together with legal interest thereon from the date of judicial demand until paid.

Plaintiff further prays for all costs of these proceedings and for any other relief to which plaintiff is entitled under the law and evidence.

Respectfully submitted,

**LABORDE EARLES LAW FIRM, LLC**

  
**DERRICK G. EARLES (Bar# 29570)**

**DAVID C. LABORDE (Bar# 20907)**

**WILL MONTZ (Bar# 29355)**

1901 Kaliste Saloom Rd. (70508)

P.O. Box 80098

Lafayette, Louisiana 70598-0098

Phone (337) 261-2617

Fax (337) 261-1934

**Attorney for plaintiff, Chris Marceaux**

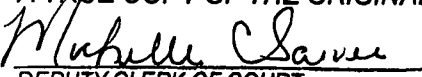
**PLEASE SERVE:**

**TRACTOR SUPPLY COMPANY**  
through its agent for service of process  
its registered agent for service of process  
CT Corporation System  
3867 Plaza Tower Drive  
Baton Rouge, Louisiana 70816

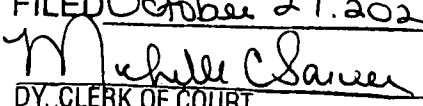
**PLEASE WITHHOLD SERVICE**

**ABC INSURANCE COMPANY**

A TRUE COPY OF THE ORIGINAL

  
DEPUTY CLERK OF COURT  
ACADIA PARISH, LA.

REC'D BY AP COC  
2021 OCT 29 AM 9:52:30

FILED   
OCTOBER 27, 2021  
DY. CLERK OF COURT  
ACADIA PARISH, LA.

15TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ACADIA

NO. 20210800

DIVISION "L"

CHRIS MARCEAUX

VERSUS

TRACTOR SUPPLY COMPANY and ABC INSURANCE COMPANY

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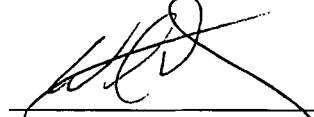
**REQUEST FOR NOTICE OF TRIAL, HEARINGS & ORDERS**

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In accordance with the provisions of Louisiana Code of Civil Procedure Annotated art 1572, plaintiff request you to send to CHRIS MARCEAUX, through the undersigned counsel, written notice of the date assigned by the court for trial on the merits as well as the date set for the hearing and/or trial of any and all motions, pleadings and other matters, at least 10 days in advance of the same, and written notice of the signing of any final judgment and/or the rendition of any interlocutory order or judgment, as provided for in Louisiana Code of Civil Procedure Annotated Articles 1913 to 1914 for the above numbered cause.

Respectfully submitted,

LABORDE EARLES LAW FIRM, LLC



**DERRICK G. EARLES (Bar# 29570)**

**DAVID C. LABORDE (Bar# 20907)**

**WILL MONTZ (Bar# 29355)**

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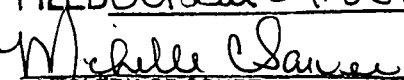
Fax (337) 261-1934

**Attorney for plaintiff, Chris Marceaux**

REC'D BY AP COC  
2021 OCT 29 AM 9:52:58

A TRUE COPY OF THE ORIGINAL

  
DEPUTY CLERK OF COURT  
ACADIA PARISH, LA.

For  
FILED October 27, 2021  
  
DY. CLERK OF COURT  
ACADIA PARISH, LA.